

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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|--------------------------|---|--------------------------|
| _____                    | ) |                          |
|                          | ) |                          |
| UNITED STATES OF AMERICA | ) |                          |
|                          | ) |                          |
| v.                       | ) |                          |
|                          | ) | CRIMINAL NO. 19-CR-10080 |
| DAVID SIDOO, et al       | ) |                          |
| Defendants               | ) |                          |
| _____                    | ) |                          |

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE PARTIALLY  
SEALED REPLY TO THE GOVERNMENT'S RESPONSE IN OPPOSITION TO THEIR  
MOTION TO SUPPRESS TITLE III INTERCEPTIONS OR ALTERNATIVELY FOR A  
FRANKS HEARING**

Defendants, by and through undersigned counsel, hereby respectfully move this Honorable Court for leave to file partially under seal their Reply to the Government's Response in Opposition (Dkt. 1138) to their Motion to Suppress Title III Interceptions or Alternatively for a *Franks* Hearing (Dkt. 1015). As grounds and reasons therefor, defendants state that certain portions of their Reply and accompanying exhibits require redaction under the operative Protective Order in this case. *See* Dkt. 377. Defendants intend to file a redacted copy of their Reply in the public record and deliver a full copy of the materials to the Court for filing under seal.

**WHEREFORE**, the defendants respectfully request that this Honorable Court allow them leave to file their Reply to the Government's Response in Opposition to their Motion to Suppress Title III Interceptions or Alternatively for a *Franks* Hearing partially under seal.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel conferred with counsel for the government, and government assents to the defendants' request to file their Reply partially under seal. The government, however, objects to the relief requested in the defendants' underlying Motion to Suppress.

Respectfully Submitted,  
Robert Zangrillo  
By His Attorney,

**/s/ Martin G. Weinberg**  
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Dated: May 11, 2020

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this date, May 11, 2020, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.